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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CONNEMARA HOLDINGS, INC.,

Appellant(s),

vs.

NON SPECIFIED,

Appellee (s).

Case No.: 24-CV-01995-GMN

Bankruptcy Case No.: 24-12212-GS

MOTION TO WITHDRAW AS COUNSEL FOR APPELLANT

David Mincin, Esq. of Mincin Law, PLLC, attorney for the above-named Appellant Connemara Holdings, Inc., respectfully requests that this Honorable Court grant leave to withdraw as counsel for the Appellant, upon the basis that Appellant has failed to meet financial commitments with the law firm. This motion is made and based upon the pleadings and papers on file, affidavit and Points and Authorities below.

POINTS AND AUTHORITIES

The attorney for the Appellant, seeks leave of this Honorable Court to withdraw as counsel for Appellant. The facts and circumstances which give rise to the filing of this motion are more fully set forth in the Affidavit of David Mincin, Esq., attached hereto and made reference herein as though fully set forth. Pursuant to Local Rule 1A 10-6 an attorney may not withdraw from a proceeding before this court without leave of the Court.

(b) No attorney may withdraw after appearing in a case except by leave of court after notice served on the affected client and opposing counsel.

Pursuant to Rules of the Nevada Supreme Court Rule 166, an attorney may withdraw as counsel for a client as follows:

2. Except as stated in subsection 3, a lawyer may withdraw from representing a client if withdrawal can be accomplished without material adverse effect on the interests of the client, or if:

(d) The client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled;

(e) The representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client; or

(f) Other good cause for withdrawal exists.

Leave of this Honorable Court is sought because Appellant has failed to meet financial commitments to the law firm. Accordingly, Mincin Law, PLLC, and David Mincin, Esq., respectfully requests that the Court grant this Motion to Withdraw as Counsel.

DATED this 8 day of November, 2024.

MINCIN LAW, PLLC

By: /s/ David Mincin

David Mincin, Esq.

Nevada State Bar No. 5427

7465 W. Lake Mead Boulevard, #100

Las Vegas, Nevada 89128

Attorney for Appellant

**AFFIDAVIT OF DAVID MINCIN, ESQ. IN SUPPORT OF
MOTION TO WITHDRAW AS COUNSEL FOR APPELLANT**

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

DAVID MINCIN, ESQ., being first duly sworn, deposes and says that:

1. I am an attorney admitted to practice law in the State of Nevada and in this court and make this affidavit upon personal knowledge.
2. I am the attorney for Appellant in this action and the docket reflects the same.
3. Appellant has failed to pay the agreed to retainer required to fund prosecution of this appeal. Requiring me and my firm to prosecute this appeal without being compensated will cause a great financial burden.
5. I have informed my client of my intent to withdraw in several emails and phone calls but the requests have not been remedied.
6. To your affiant's knowledge, the last known address of Appellant at which he may be served with further proceedings taken in this case is:

Connemara Holdings, Inc.
2695 Beverly Drive, #1800
Beverly Hills, CA 90212

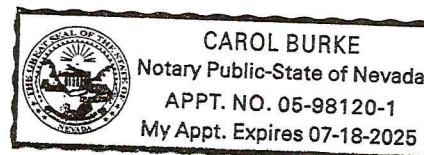
Connemara Holdings, Inc.
Attn: Adib Kassir, President
123 W. Nye Lane, #129
Carson City, Nevada 89706
Email: medconsult.office@gmail.com

Further your affiant saith not.


David Mincin, Esq.

SUBSCRIBED and SWORN TO before me
this 8th day of November, 2024.


NOTARY PUBLIC



CERTIFICATE OF SERVICE

I certify that I am an employee of Mincin Law, PLLC and on the 8th day of November, 2024, service of a true and correct copy of the MOTION TO WITHDRAW AS COUNSEL FOR APPELLANT was made by:

☒ **ELECTRONIC SERVICE:** Pursuant to Local Rule LR IC 4-1 of the United States District Court For the District of Nevada, the above-referenced document was electronically filed and served on all appearing parties through the Notice of Electronic Filing automatically generated by the Court.

☒ **UNITED STATES MAIL:** By depositing a true and correct copy of the above-referenced document into the United States Mail with prepaid first-class postage, addressed to the parties at their last-known mailing address:

Connemara Holdings, Inc.
2695 Beverly Drive, #1800
Beverly Hills, CA 90212

Connemara Holdings, Inc.
Attn: Adib Kassir, President
123 W. Nye Lane, #129
Carson City, Nevada 89706

☒ **ELECTRONIC MAIL:** By sending the above-referenced document via electronic mail (Email) to those persons and those addresses listed below:

BRIAN D. SHAPIRO on behalf of Interested Party DISTRICT ATTORNEY OF LOS ANGELES COUNTY brian@brianshapirolaw.com, kshapiro@brianshapirolaw.com; bryce@brianshapirolaw.com

Connemara Holdings, Inc.
Attn: Adib Kassir, President
medconsult.office@gmail.com


s. Carol Burke

An employee of Mincin Law, PLLC